

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) KRISTOPHER SEAN MATTHEW

Defendant.

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NO: SA: 20-CR-00488-OLG

AGREED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Warren Alan Wolf, attorney for KRISTOPHER SEAN MATTHEWS, defendant in the above styled and numbered cause, and pursuant to 18 U.S.C § 3161(h) (8) (A), Federal Rule of Criminal Procedure Rule 47, and Local Rule CR-12, respectfully moves this Honorable Court for this motion for continuance in the above styled and numbered cause, and would show the Court as follows:

I.

This Motion is not made for delay. Good cause exists for this continuance to reschedule the sentencing proceeding now set for May 6, 2021 because the counsel for the Defendant needs more time investigate the facts for his sentencing memorandum and/or motion for variance.

In addition, Defendant requests such a continuance in order to exercise the right to effective assistance of counsel as guaranteed by the 6th Amendment to the United States Constitution.

Respectfully submitted,

LAW OFFICES OF WARREN ALAN WOLF
111 Soledad St., Suite 850

San Antonio, Texas 78205
Tel.: (210) 225-0055
Fax: (210) 225-0061

/S/Warren Alan Wolf
WARREN ALAN WOLF
State Bar No. 21853500

CERTIFICATE OF CONFERENCE

I hereby certify that on the 28th day of April, 2021, I conferred with Mr. MARK ROOMBERG, counsel for the Plaintiff, regarding this motion to which he does not oppose.

/S/Warren Alan Wolf
WARREN ALAN WOLF

CERTIFICATE OF SERVICE

I do hereby certify that on April 29, 2021, I electronically filed the foregoing pleading with the Clerk of the Court for the U.S. District Court, Western District of Texas, using the electronic case-filing system of the Court. The electronic case-filing system sent a "Notice of Electronic Filing" to the following attorney of record:

Mr. Mark Roomberg, Esq.
Assistant United States Attorney
601 NW Loop 410, Suite 600
San Antonio, TX 78216

/S/Warren Alan Wolf
WARREN ALAN WOLF

UNITED STATES DISTRICT COURT

**WESTERN DISTRICT OF TEXAS
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ORDER

Upon motion of the defendant, KRISTOPHER SEAN MATTHEWS, for a continuance in this case, and the Court having reviewed the facts and legal issues surrounding said motion, this Court hereby GRANTS/DENIES said motion. The Court orders this case to be reset to the ____ day of _____, 2021.

SIGNED this ____ day of _____, 2020.

JUDGE PRESIDING